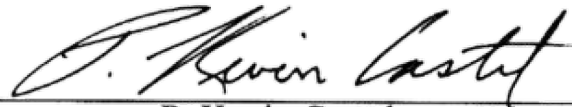


**GT** GreenbergTraurig June 12, 2025 initial conference is adjourned to September 5, 2025 at 10:30 a.m. Call-In: 855-244-8681; Access Code: 2305 810 3970#. File Amended Complaint by May 30, 2025. Defendants' time to respond extended to July 11, 2025. Defendants need not answer the existing Complaint.  
**SO ORDERED.**  
**Dated: 4/23/2025**

Sylvia E. Simson  
Tel 212.801.2169  
Sylvia.Simson@gtlaw.com

April 23, 2025

**BY ECF**

  
P. Kevin Castel  
United States District Judge

Hon. P. Kevin Castel  
United States District Court for the Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl St. New York, New York 10007

Re: **Chris Surrey v. Fidelity Investments et al., Case No. 1:25-CV-03263-PKC—Joint Request To Stay Responsive Pleading Deadline And For Deadlines to File Amended Complaint And Respond to Same**

Dear Judge Castel,

Pursuant to Your Honor's Individual Practices, we write on behalf of defendant JPMorgan Chase Bank, N.A. ("Chase"), who we represent in this matter, as well as plaintiff Chris Surrey ("Plaintiff"), to jointly request that this Court enter an order adopting the parties' agreed-upon deadlines for (1) Plaintiff to file an Amended Complaint, and (2) all Defendants (including Chase) to respond to said Amended Complaint once it is filed.

By way of background, this action was commenced in the Supreme Court of New York, New York County, and Chase removed this case on April 18, 2025. *See* Doc. No. 1. Following receipt of the Notice of Removal, Plaintiff indicated to Chase his intention to file an Amended Complaint so that his pleading resembles a federal (as opposed to a state court) pleading. Chase responded that, if the claims themselves are not going to change and the changes made will be largely procedural in nature, it consents to this request provided that the responsive pleading deadline is stayed until the Amended Complaint is filed. As this case will proceed in this court, the parties agreed to the following schedule, which they respectfully request that the Court adopt:

- Plaintiff will file an Amended Complaint involving the same claims by **May 30, 2025**; and
- Defendants' responsive pleading deadline in connection with the current Complaint is stayed pending the filing of the Amended Complaint, and Defendants will respond to the Amended Complaint as may be appropriate by **July 11, 2025**.

We thank the Court for its attention to this matter and are available to discuss at Your Honor's convenience.

Respectfully submitted,  
/s/ Sylvia E. Simson  
Sylvia E. Simson